

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

UNITED STATES OF AMERICA)	
)	
)	
)	
v.)	No. 08 CR 5
)	
PATRICK MCKIBBINS)	Judge Gettleman
)	
Defendant.)	
)	

**AGREED MOTION FOR AN EXTENSION
OF TIME TO FILE PRETRIAL MOTIONS**

The Defendant, Patrick McKibbins, by his counsel, seeks an Order of this Court granting an extension of time to file his pretrial motions in the above captioned case to September 8, 2008. In support thereof, Defendant states as follows:

1. Assistant United States Attorney Bethany Biesenthal has agreed to the requested extension of time to file pre-trial motions on behalf of the United States Government.
2. The deadline to file pretrial motions was set for on or before September 4, 2008.
3. Counsel for Mr. McKibbins also has to file motions in another case by the same date, September 4, 2008.
4. The extension should not affect the remainder of the schedule that was issued by this Court since the government intends on filing their response by September 12, 2008.

WHEREFORE, Defendant seeks an Order from this Court extending the time to file the pretrial motions in the instant case to and including September 8, 2008.

Respectfully submitted,

/s/ Bart E. Beals

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